

Small Business Administration

Privacy Impact Assessment

For

Partner Identification and Management System

August 2005

Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the Partner Identification and Management System (PIMS). This document has been completed in accordance with the requirements of the E-Government Act of 2002.

MANAGEMENT CERTIFICATION – Please check the appropriate statement.

_____ The document is accepted.

_____ The document is accepted pending the changes noted.

_____ The document is not accepted.

We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

System Manager

DATE

OCIO/Project Representative

DATE

Program/Office Head

DATE

OCIO

DATE

Chief FOI/PA

DATE

Senior Official for Privacy

DATE

Name of Project: Partner Identification Management System
Program Office: Office of Financial Assistance
Project's Unique ID:

A. CONTACT INFORMATION:

1. Who is the person completing this document?

Ann Bradbury
Financial Analyst
Office of Financial Assistance
ann.bradbury@sba.gov
202-205-7507

2. Who is the system owner?

Steve Kucharski
Office of Financial Assistance
stephen.kucharski@sba.gov
202-205-7551

3. Who is the system manager for this system or application?

Ann Bradbury
Financial Analyst
Office of Financial Assistance
ann.bradbury@sba.gov
202-205-7507

4. Who is the IT Security Manager who reviewed this document?

Ethel Matthews
Chief Information Security Officer
Office of the Chief Information Officer
ethel.matthews@sba.gov
(202) 205-6372

5. Did the Chief FOI/PA review this document?

Lisa Babcock
Chief, Freedom of Information/Privacy Acts Office
lisa.babcock@sba.gov
(202) 401-8203

6. Did the Agency's Senior Office for Privacy review this document?

Delorice P. Ford
Assistant Administrator Office of Hearings and Appeals
Senior Agency Official for Privacy
delorice.ford@sba.gov
(202) 205-7340

7. Who is the Reviewing Official?

Delorice P. Ford

Assistant Administrator Office of Hearings and Appeals

Senior Agency Official for Privacy

delorice.ford@sba.gov

(202) 205-7340

B. SYSTEM APPLICATION/GENERAL INFORMATION:

1. Does this system contain any information about individuals?

No

(a) Is this information identifiable to the individual?

No

(If there is **NO** information collected, maintained, or used that is identifiable to the individual in the system, the remainder of the Privacy Impact Assessment does not have to be completed past this section. **Note:** Clearance sheet must be signed and copies to IT Security and Chief FOI/PA must be provided).

(b) Is the information about individual members of the public?

No

(c) Is the information about employees?

No

2. What is the purpose of the system/application?

3. What legal authority authorizes the purchase or development of this system/application?

C. DATA in the SYSTEM:

1. Generally describe the type of information to be used in the system and what categories of individuals are covered in the system?

2. What are the sources of the information in the system?

(a) Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?

(b) What Federal agencies are providing data for use in the system?

- (c) **What State and local agencies are providing data for use in the system?**
 - (d) **From what other third party sources will data be collected?**
 - (e) **What information will be collected from the employee and the public?**
- 3. Accuracy, Timeliness, and Reliability**
- (a) **How will data collected from sources other than SBA records be verified for accuracy?**
 - (b) **How will data be checked for completeness?**
 - (c) **Is the data current?** What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).
 - (d) **Are the data elements described in detail and documented?** If yes, what is the name of the document?

D. ATTRIBUTES OF THE DATA:

- 1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?**
- 2. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**
- 3. Will the new data be placed in the individual's record?**
- 4. Can the system make determinations about employees/public that would not be possible without the new data?**
- 5. How will the new data be verified for relevance and accuracy?**
- 6. If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**
- 7. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.**
- 8. How will the data be retrieved?** Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.
- 9. What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

10. What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses and how individuals can grant consent.)?

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:

1. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?
2. What are the retention periods of data in this system?
3. What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?
4. Is the system using technologies in ways that the SBA has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?
5. How does the use of this technology affect public/employee privacy?
6. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.
7. What kinds of information are collected as a function of the monitoring of individuals?
8. What controls will be used to prevent unauthorized monitoring?
9. Under which Privacy Act systems of records notice does the system operate? Provide number and name.
10. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.

F. ACCESS TO DATA:

1. Who will have access to the data in the system? (e.g., contractors, users, managers, system administrators, developers, tribes, other)
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?
3. Will users have access to all data on the system or will the user's access be restricted? Explain.
4. What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access? (Please list processes and training materials)

5. **Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system?** If yes, are Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?
6. **Do other systems share data or have access to the data in the system? If yes, explain.**
7. **Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**
8. **Will other agencies share data or have access to the data in this system (Federal, State, Local, Other)?**
9. **How will the data be used by the other agency?**
10. **Who is responsible for assuring proper use of the data?**